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Attorneys for Plaintiff  
ANA VENTURA

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

ANA VENTURA,

Plaintiff,

vs.

PANAGITIS K. ALEXOPOULOS D/B/A  
TOM'S BURGERS; 1501 OLYMPIC  
LLC; and DOES 1 to 10,  
Defendants.

**Case No.: 2:23-cv-07333-AS**

**NOTICE OF VOLUNTARY  
DISMISSAL OF DEFENDANT  
PANAGITIS K. ALEXOPOULOS  
D/B/A TOM'S BURGERS**

**PLEASE TAKE NOTICE** that Plaintiff ANA VENTURA ("Plaintiff") pursuant to Federal Rule of Civil Procedure Rule 41(a)(1) hereby voluntarily dismisses Defendant PANAGITIS K. ALEXOPOULOS D/B/A TOM'S BURGERS ("Defendant") *without prejudice* pursuant to Federal Rule of Civil Procedure Rule 41(a)(1) which provides in relevant part:

**(a) Voluntary Dismissal.**

- (1) *Without a Court Order.* Subject to Rules 23(e), 23.1(c), 23.2, and 66 and any applicable federal statute, the plaintiff may dismiss an action without a court order by filing:

1 (i) A notice of dismissal before the opposing party serves either an  
2 answer or a motion for summary judgment.

3 Defendant has neither answered Plaintiff's Complaint, nor filed a motion for summary  
4 judgment. Accordingly, Defendant may be dismissed without an Order of the Court.  
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7 DATED: September 13, 2023 SO. CAL. EQUAL ACCESS GROUP

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9 By: /s/ Jason J. Kim

10 Jason J. Kim  
11 Attorneys for Plaintiff  
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